

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**DISABILITY RIGHTS MISSISSIPPI**

**PLAINTIFF**

**V.**

**CAUSE NO. 3:21-cv-726-CWR-FKB**

**MISSISSIPPI DEPARTMENT OF MENTAL  
HEALTH**

**DEFENDANT**

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**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

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Pursuant to Fed. R. Civ. P. 65, Plaintiff, DISABILITY RIGHTS MISSISSIPPI, seeks to enjoin Defendant, MISSISSIPPI DEPARTMENT OF MENTAL HEALTH, from restricting its statutorily-mandated authority to access facilities and records upon establishing probable cause of abuse and neglect. Plaintiff requests that this Court issue a preliminary injunction, requiring Defendant to permit Plaintiff to discharge its duty to conduct an effective investigation into facilities and allow access to the necessary records in order to investigate potential abuse and neglect to the full extent permitted by federal and state law.

Plaintiff's Memorandum in Support of this Motion is attached and incorporated herein by reference. Further, Plaintiff would incorporate the Amended Complaint [Docket No 2] and its Exhibits by reference.

**RESPECTFULLY SUBMITTED**, this the 4<sup>th</sup> day of January, 2022.

**DISABILITY RIGHTS MISSISSIPPI**

/s/ Greta Kemp Martin

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing has been filed with this Court's electronic filing system which automatically sends notice to all Attorneys of record.

Dated: January 2, 2022

/s Greta Kemp Martin  
GRETA KEMP MARTIN, MSB# 103672

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